

EXECUTION VERSION

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**RONALD BETHUNE, on behalf of himself and
all others similarly situated,**

Plaintiff,

-against-

**LENDINGCLUB CORPORATION,
WEBBANK, STEEL PARTNERS
HOLDINGS, L.P., THE LENDING CLUB
MEMBERS TRUST, and DOES 1 through
10, inclusive,**

Defendants.

Case No. 1:16-cv-02578 (NRB)

**STIPULATION AND PROPOSED
ORDER OF DISMISSAL WITH
PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a), Plaintiff Ronald Bethune, by and through his attorneys, and Defendants LendingClub Corporation, WebBank, Steel Partners Holdings, L.P., and The Lending Club Members Trust, by and through their attorneys, hereby jointly move for an order dismissing with prejudice all claims against all Defendants in the above-captioned action, with each party to bear its own costs, expenses, and attorneys' fees.

SO ORDERED this _____ day of _____, 2018.

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Dated: New York, New York

~~January 5~~ 5, 2018

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